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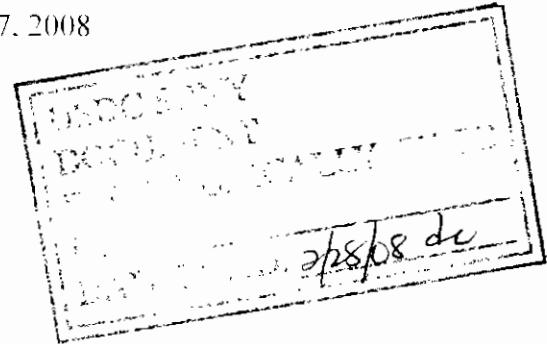
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February 27, 2008

By Hand

Hon. Barbara S. Jones  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



Re: United States v. Bobby Saunders, et al.  
Ind. No. S4 07 Cr. 3 (BSJ)

Dear Judge Jones:


This letter is respectfully submitted on behalf of the defendant **Hisan Lee** to request that the Court approve the appointment of learned counsel to assist Mr. Lee in the defense of capital offenses now charged in the Superseding Indictment. In addition I am requesting court authorization for the appointment of mitigation specialists to assist the defense in the preparation and presentation of the mitigation case to the government in its determination of whether to seek the death penalty – and in further proceedings if necessary.

I propose the appointment of Kevin McNally for that purpose. I have spoken with Mr. McNally. He is willing and able to accept the assignment. Mr. McNally has a wealth of national experience defending capital case including in this jurisdiction. He is the current Director of the Federal Death Penalty Resource Counsel (FDPRC). I attach his resume for the Court's review.

I also propose that Carmeta v. Albarus-Lindo, LCSW and Eutifan Lange-Cameron, LCSW be approved to assist as mitigation experts, and that the Court authorize their services pursuant to the CJA Act. They work together. Both have extensive experience in mitigation in capital cases. Their resumes are attached as well.

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Respectfully submitted,

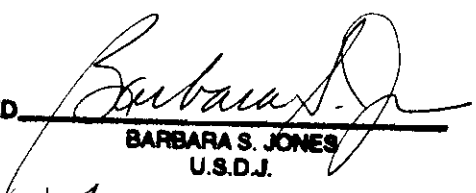
  
Michael H. Sporn

MHS/ss

Cc: Michael English, Esq./Elizabeth Maringer, Esq.  
Kevin McNally, Esq.  
Leonard Joy, Esq.

*Applications Granted*

SO ORDERED  
Dated:

  
BARBARA S. JONES  
U.S.D.J.  
*Feb. 28, 2008*